

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Maureen P. Kaumann	:	Chapter 13
	:	Case No.: 18-13048 AMC
Debtor(s)	:	

EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY

Debtor, Maureen P. Kaumann, by and through her undersigned counsel bring this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtors commenced the instant Chapter 13 matter on May 4, 2018 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on January 16, 2019.
3. The subject real property is located at 1012 Ponderosa Rd., Feasterville, PA (hereinafter referred to as “the property”) and is owned by the Debtor and her spouse.
4. The Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Kathleen Rudolph Ross of Honest Real Estate.
6. On or about March 13, 2022 , Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$330,000. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for May 19, 2022.

8. Based on the May 19, 2022 settlement date, an emergency hearing is necessary in this matter.

9. The Buyer, Michael Beeson, is not an insider of the Debtor and the sale represents and arms-length transaction between the parties made without fraud and/or collusion.

10. From the sale proceeds the Debtor intend to satisfy the mortgages held by Barbara A. Kaumann, along with any other liens on the property.

11. The Debtor is desirous of receiving their full exemption in the sum of up to \$25,150.00 plus any remaining proceeds after all liens and the entire Chapter 13 Balance is satisfied.

WHEREFORE, Debtors, respectfully request that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtors to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtors such other and further relief to which they may be justly entitled.

Dated: April 29, 2022

/s/Brad J. Sadek, Esq
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